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0800
PACIFIC SOILS ENGINEERING & TESTING
CONSULTING ENGINEERS AND GEOLOGISTS

HARMON INDUSTRIAL PARK
PHONE: 646-6371

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TAMUNING, GUAM 96911

1980 APR 15 AM 8 36

U.S. NUCLEAR REG.
COMMISSION
MAIL SECTION

April 11, 1980

Division of Fuel Cycle and Material Safety
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Reference: Control No. 02161

Attention: Mr. James A. Jones
Material Licensing Branch

Gentlemen:

In response to your letter of February 19, 1980, we have prepared the attached modified Radiation Safety Program as part of our Application For By-product Material License. This replaces the Item 15 of our original application.

We hope this additional information and clarification provided in this modified Item 15 meets with your approval and that the review of our application can be completed. Thank you.

Yours very truly,
PACIFIC SOILS ENGINEERING & TESTING

David J. McConnell
David J. McConnell, P.E.
Principal Engineer

Attachments

COPIES SENT TO OFF. OF
INSPECTION AND ENFORCEMENT

8004290402 3pp.

ITEM 15

0800

RADIATION SAFETY PROGRAM

PACIFIC SOILS ENGINEERING & TESTING
P. O. Box 8453
Tamuning, Guam 96911
Phone: 646-6040

A. SAFETY PROCEDURES

1. Do not operate or attempt to operate a gauge unless you have been authorized to do so.
2. Do not attempt to repair, modify or open the sealed source under any circumstances.
3. Wear a film badge at all times while operating or transporting a gauge.
4. Follow operating procedures, when using the gauge, in accordance with the Troxler instruction manual, the radiation control regulations and this safety program.
5. Keep unauthorized persons away from the gauge.
6. Do not leave the gauge unattended when in use or outside of the storage enclosure or locked vehicle.
7. Keep the gauge in the "SAFE" or storage position when not in use.
8. Be sure that the gauge is locked within an authorized enclosure (e.g. closet, cabinet, vehicle, etc.) when it is not in use. Security against the theft of a radioisotope is of utmost importance and must not be neglected. The storage enclosure must be labeled with a radiation warning sign bearing the symbol as described in 10 CFR 20.203 and the words "CAUTION RADIOACTIVE MATERIALS".
9. Gauge(s) may be only transported by authorized personnel in approved vehicles. The gauge(s) may not be transported on the front or rear seats of any vehicle. If a pickup truck is used the gauge(s) must be locked in an enclosure (e.g. cabinet, shipping case, etc.) and the enclosure tied securely (e.g. chained, bolted, etc.) to the body of the truck in order to prevent loss or theft.
10. Ensure that the gauge is leak tested at the intervals required by the licensee's Radioactive Materials License. The wipe sample will be collected by the Radiation Safety Officer using a Troxler model 3880 leak test kit. The leak test measurement on the wipe sample will be performed by Troxler Electronic Laboratories, Inc., P. O. Box 12057, Research Triangle Park, NC 27709.
11. When in doubt, ask your Radiation Safety Officer.

B. EMERGENCY PROCEDURE

0800

1. Accidents

- a. In the event of possible damage to source or source control mechanism, the operator will keep unauthorized persons at least ten feet from gauge and prevent removal of gauge from site until authorized by RSO or appropriate authority.
- b. If there is any possibility the source capsule might be ruptured, the location must be covered by a sheet of material (plastic, tarp, etc.), held down by weights (rocks, bags of material, etc.) to prevent scattering of radioactive material by the elements.
- c. The operator must then immediately notify his RSO of the incident and give an appraisal of the probable condition of the source.
- d. The RSO will then immediately notify the following authority who will provide instructions and assistance in accordance with the circumstances of the incident.

Region V, USNRC
Office of Inspection and Enforcement
1990 N. California Blvd., Suite 202
Walnut Creek, CA 94596

24 hour telephone: (415) 932-8300

2. Source stolen or lost.

- a. The operator must immediately notify local police or other law enforcement agency within whose jurisdiction the incident occurred.
- b. The operator must also notify his RSO who will notify the authority listed in item B-1-d above.

C. DUTIES OF THE RADIATION SAFETY OFFICER

1. Assure compliance with all pertinent parts of the controlling agency's [REDACTED] regulations.
2. Assure compliance with the conditions in licensee's Radioactive Materials license and amendments and above items given in this safety program.
3. Maintain the following items in a radiation file and keep available for inspection by controlling agency if requested.
 - (a) Current Radioactive Materials License.
 - (b) Copies of license application, attachments and all pertinent correspondence referred to in the conditions of the license and amendments.
 - (c) Gauge Source Certificate(s) issued with the gauge(s) by the manufacturer.
 - (d) Film badge or TLD reports.
 - (e) Leak test reports.
 - (f) Records concerning disposal, inventory and useage of source(s).
 - (g) Copies of this safety program.
 - (h) A current copy of the controlling agency's regulations.